

Community Mobilization Policy Revision February 2011

F. Monitoring

ADOPTED 9/5/2002, Revised 02/14/11

Monitoring is any planned, ongoing or periodic activity that measures and ensures contractor compliance with the terms, conditions, and requirements of a contract.

Each contractor will be monitored by a desk monitoring or an on-site monitoring at least once every three years. Determination for a receiving a desk monitoring or an on-site monitoring will be based on funding level. All contractors receiving less than \$25,000 in a contract year will receive a desk monitoring. All contractors receiving \$25,000 or more in a contract year will receive an on-site monitoring. A risk assessment tool will be employed annually on each contract and may result in a contract being monitored sooner than originally scheduled or more frequently than once every three years or may result in an on-site monitoring rather than a desk monitoring.

Commerce CM staff will provide this review. Ongoing program review occurs through review of reimbursement requests, program activity data, contractors' correspondence, and annual reports.

The general purpose of these reviews is to determine the contractor's compliance with state and federal regulations and laws. It may also provide an impetus for program evaluation and improvement.

Each local contractor is encouraged to conduct a self-assessment. Information from self-assessments may be provided to the Commerce staff at the beginning of the on-site monitoring for exploration of issues and strengths.

1. Introduction

The Community Mobilization philosophy in regard to Monitoring is that the process is intended to document where the program is working well and to offer technical assistance, support, and guidance where it needs improvement or is out of compliance. If a program is found out of compliance or in serious need of improvement, Commerce staff will provide assistance to the program to return it to compliance.

If the program is found to be out of compliance, sufficient time will be given to the program to correct the shortcomings. The amount of time needed will be determined case-by-case, based on the length of time needed to correct the discrepancy.

2. Responsibilities

Contractors are responsible for planning and carrying out programs, projects, and activities in accordance with contract requirements and state and federal regulations. The role of Commerce is to ensure that contractors carry out their programs in accordance with applicable laws and regulations and legislative intent. Commerce will assist contractors to identify problems or potential concerns in their programs, and provide technical assistance.

3. Monitoring Objectives

Contract recipients must have an effective management system in place to successfully implement their CM Program and comply with contract requirements.

Objectives of the monitoring process include:

- a. Review of program activities, including activities of the CM Policy Board, the Meth Action Team, and other coalitions funded under the Commerce CM contract.
 - b. Support of the following state and federal activities.
 - i. Policy making
 - ii. Strategic planning
 - iii. Evaluation of program effectiveness
 - iv. Making individual project contract decisions
 - v. Managing individual project contract awards
 - c. The review process includes, but is not limited to:
 - i. Review of the project assessment, application, and contract requirements
 - ii. Review of statistical reporting data
 - iii. Review of fiscal reporting data
 - iv. Verification of compliance with financial requirements
 - v. Review of programmatic activities for compliance
 - d. Commerce staff will monitor contractors on-site to determine if contract requirements are met. The areas to be examined include, but are not limited to, the following:
 - i. Compliance with needs assessment, application, and implementation activities; and contractual, budget, and financial management, including requirements of RCW 43.270 (state general funds) and any other funding sources included in the Commerce CM contract.
 - ii. Progress in achieving program goals, objectives, implementation activities, and evaluation plans.
 - iii. Determining the success of the program in meeting its goals and objectives, providing measurable outcomes, and addressing the risk and protective factors prioritized in the community to reduce substance abuse and violence.
 - iv. Compliance with state and federal regulations.
 - e. Prior to an on-site review, Commerce will assist contractors by:
 - i. Tracking actual and planned expenditures.
 - ii. Reviewing contract performance and compliance.
 - iii. Reviewing the most recent program audit completed for the contractor.
 - iv. Providing individual technical assistance, when necessary, to ensure compliance.
4. Monitoring Definitions

The following terms are used throughout this section:

- a. Areas of Review: Subject in which the contractor's performance may be reviewed (e.g., program strategies, eligible activities, subcontracts, board policies, equal opportunity, drug-free workplace, etc.).

- b. Findings: Substantial evidence obtained by Commerce as a result of any monitoring or reporting activity which indicates contract compliance or noncompliance with specific requirements of applicable laws or regulations.
 - c. Monitoring: Monitoring is any planned, ongoing or periodic activity that measures and ensures contractor compliance with the terms, conditions, and requirements of a contract.
 - d. On-site Monitoring: Commerce CM staff will conduct on-site monitorings for the principal purpose of determining contract performance, progress, and compliance with requirements of the program and applicable laws or regulations.
 - e. Desk Monitoring: A process of reviewing the contractor's program and fiscal administration to determine the contractor's performance, progress, and compliance with requirements of the program and applicable laws or regulations.
5. Monitoring Documents
- The following sources of information including responsiveness and timeliness of submittal will be used in the desk monitoring or on-site monitoring:
- a. Contractor's current Six-Year Strategic Plan for Prevention, Intervention, Treatment and Aftercare.
 - b. Contractor's current online workplan.
 - c. A minimum of one Request for Reimbursement (invoice vouchers) and backup documentation selected by Commerce CM staff.
 - d. Current audit reports.
 - e. Previous monitoring reports.
 - f. Program activity reports.
 - g. CM Policy Board meeting minutes and board listing
 - h. Data supplied by contractor through the Desk Monitoring Questionnaire or the On-site Monitoring Questionnaire.
 - i. Other information requested or provided.
6. Monitoring Process
- a. On-Site Monitoring
 - i. On-site monitorings shall be conducted for contractors with higher levels of funding and/or risk.
 - ii. If there is insufficient funding for travel, or travel is restricted by sources outside the program, desk audits may be conducted in lieu of on-site monitoring until such time as on-site monitoring can resume.
 - iii. Contractors will be notified in writing 30 days before any on-site monitoring. The monitoring notice will include:
 - a. Day, date, and time
 - b. Estimate of how much time is needed
 - c. Purpose of the review
 - d. Individuals to meet with
 - e. Documents requested
 - f. Commerce on-site tasks
 - g. What to expect from Commerce at the conclusion of the visit
 - h. Contact information for questions or concerns

- iv. The data and documents requested, as well as discussions with various contractor representatives, will be used to determine contract activity and to identify issues and potential problems, program status, and program. The reviewer will:
 - a. Review pertinent contractor program participant files, and may review third-party files.
 - b. Meet with the fiscal and primary program staff to review compliance with federal financial and administrative regulations.
 - c. Interview appropriate Policy Board members; members of the contractor's staff; and, as appropriate, participating agency staff and citizens or citizens groups.
 - d. Visit the contractor's headquarters and, as appropriate, specific sites(s)/area(s).
 - e. Discuss with the contractor any discrepancy in data resulting from the files examined, interviews, and visits to project sites.
 - f. Conduct an exit interview with the chief contractor official and/or the appropriate executive staff to discuss the findings of the on-site monitoring.
 - b. Desk Monitoring
 - i. A desk monitoring is the process of reviewing contract performance using available data to determine contractor performance. Desk monitorings shall be conducted for contractors with lower levels of funding and/or risk. If the desk monitoring reveals a serious issue of compliance or need for improvement, either a full on-site monitoring visit may be conducted, or technical assistance may be scheduled.
 - ii. Contractors will be notified in writing of the desk monitoring. The monitoring notification letter will include a list of items to be provided to reviewer and a timeline for submittal.
7. Post-Monitoring Action
- a. On-Site Monitoring

Follow up to the monitoring will occur as early as possible, particularly if there are significant findings of non-compliance. A letter to the contractor will be sent within 45 days after the visit to report the results of the monitoring. The content of the monitoring report will include, but not be limited to, the following:

 - i. The scope of the monitoring.
 - ii. Monitoring conclusions supported by facts considered in reaching the conclusions, including any minor or significant discrepancies found.
 - iii. Specific corrective actions required, if any.
 - iv. Date any corrective actions must be completed.
 - b. Desk Monitoring
 - i. The reviewer will share the review results in writing. If there are no discrepancies noted, the review is complete.
 - ii. If discrepancies are noted and minor in nature, or can be easily remedied, the contractor must respond in writing to Commerce staff. The response must include how the issue was corrected.

- iii. If Commerce staff agrees with the correction, staff will notify the contractor in writing. If no further action is needed, the review will be considered completed.
 - iv. If the desk monitoring reveals a serious issue of compliance or need for improvement, either a full on-site monitoring may be conducted, or technical assistance may be scheduled.
 - c. Follow-up Action
 - i. The contractor will be given 30 days to respond to the findings and, if necessary, develop a corrective action plan. See f. below.
 - ii. If the contractor does not respond within 30 days, payment may be withheld until the required responses are submitted to Commerce.
 - iii. Findings that are not addressed in the corrective action plan may be grounds for contract termination.
 - d. Resolving Monitoring Findings
 - i. The contractor will correct the item(s) out of compliance and send written notification to Commerce CM staff of the correction and the steps taken to achieve these results.
 - ii. When the compliance issue cannot be addressed immediately, the contractor will submit a plan to Commerce CM staff. The plan will include the time frame and strategy for correcting the issue. Commerce staff will determine if the corrective action plan is sufficient to meet all requirements. If acceptable, Commerce CM staff will respond in writing to the contractor. If the plan is unacceptable, Commerce CM staff will work with the contractor to devise an acceptable plan.
 - iii. When the issue has been corrected, the contractor will notify Commerce CM staff in writing.
 - iv. A follow-up visit may be conducted at any time to ensure that the issue has been addressed.
 - v. Commerce CM staff will produce a Response Review Outcome, a communication from Commerce to the contractor that indicates the acceptance, non-acceptance, or acceptance with comments of the required response.
- 8. Monitoring Files: All documents regarding the review and subsequent actions will be placed in the contractor's file, which may include:
 - a. Pre-monitoring letter.
 - b. Completed Monitoring Tool/Questionnaire.
 - c. All follow-up letters from agency staff, including all noted discrepancies and the acceptance of corrective actions and/or plans:
 - d. All contractor responses, including timelines and plans for correcting and documents demonstrating correction of discrepancies serious discrepancies.